

1 Deverie J. Christensen
2 Nevada State Bar No. 6596
3 Joshua A. Sliker
4 Nevada State Bar No. 12493
5 **JACKSON LEWIS P.C.**
6 300 S. Fourth Street, Suite 900
7 Las Vegas, Nevada 89101
8 Tel: (702) 921-2460
9 Email: deverie.christensen@jacksonlewis.com
joshua.sliker@jacksonlewis.com

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11 *Attorneys for Defendants*
12 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRENNNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Case No.

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

NOTICE TO FEDERAL COURT OF
REMOVAL OF CIVIL ACTION FROM
STATE COURT

Defendants.

Pursuant to 28 U.S.C. § 1332(d), Defendants Wynn Las Vegas, LLC and Wynn Resorts,
Ltd. hereby notify the Court of the removal of *BRENNNA SCHRADER, an individual, on behalf of*
herself and all others similarly situated, v. STEPHEN ALAN WYNN; an individual; MAURICE
WOODEN, an individual, WYNN LAS VEGAS, LLC dba WYNN LAS VEGAS a Nevada Limited
Liability, WYNN RESORTS, LTD, a Nevada Limited Liability Company; and DOES 1-20,
inclusive; ROE CORPORATIONS 1-20, inclusive, Case No. A-19-802598-C, which was filed in
the Eighth Judicial District Court in Clark County, Nevada. In support of said removal,
Defendants state as follows:

1 1. On September 26, 2019, an action was commenced in the Eighth Judicial District
 2 Court of Clark County, Nevada, entitled *BRENNNA SCHRADER, an individual, on behalf of*
 3 *herself and all others similarly situated, v. STEPHEN ALAN WYNN; an individual; MAURICE*
 4 *WOODEN, an individual, WYNN LAS VEGAS, LLC dba WYNN LAS VEGAS a Nevada Limited*
 5 *Liability, WYNN RESORTS, LTD, a Nevada Limited Liability Company; and DOES 1-20,*
 6 *inclusive; ROE CORPORATIONS 1-20, inclusive.* A copy of the Complaint is attached hereto as
 7 **Exhibit A.**

8 2. Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. were served on
 9 November 25, 2019 with a copy of the Complaint and a Summons issued by the state court on or
 10 about September 27, 2019. A copy of the Summons are attached hereto as **Exhibit B.**

11 3. Plaintiffs attempted to serve Defendant Stephen Alan Wynn (Mr. Wynn) on
 12 December 11, 2019, with a copy of the Complaint and a Summons issued by the state court on or
 13 about September 27, 2019. An affidavit of service was filed as to that attempt, and Mr. Wynn's
 14 Counsel has offered to accept service. A copy of the Summons is not yet available on the Court's
 15 website.

16 4. Defendant Maurice Wooden (Mr. Wooden) was served on December 12, 2019
 17 with a copy of the Complaint and a Summons issued by the state court on or about September 27,
 18 2019. A copy of the Summons is not yet available on the Court's website.

19 5. Undersigned Counsel communicated with Counsels for individually named
 20 defendants Mr. Wynn and Mr. Wooden, on December 13, 2019, regarding removal of this case,
 21 and understands they intend to file consents to removal when they appear in this case.

22 6. This action is properly removed to federal court under federal question jurisdiction
 23 because Plaintiff's Complaint contains claims which arise under federal law, specifically, Title
 24 VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, the Fair Labor Standards Act, 29. U.S.C.
 25 § 201 *et. seq.*, Forced Labor, 18 U.S.C. § 1589, and Federal Racketeering Influenced and Corrupt
 26 Organizations (RICO), 18 U.S.C. § 1962. *See* 28 U.S.C. § 1441.

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7. This Notice of Removal is being filed within thirty (30) days of receipt of any pleadings setting forth the claim for relief upon which the action is based and is, therefore, timely under 28 U.S.C. § 1331 and § 1446(b).

8. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this court pursuant to the provisions of 28 U.S.C. § 1441(a), in that it is a civil action arising under the Constitution, laws, or treaties of the United States. Specifically, Plaintiff alleges conduct in violation of the Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, the Fair Labor Standards Act, 29. U.S.C. § 201 *et. seq.*, Forced Labor, 18 U.S.C. § 1589, and Federal Racketeering Influenced and Corrupt Organizations (RICO), 18 U.S.C. § 1962. Any remaining state law claims are also properly removed pursuant to the Court's supplemental jurisdiction. 28 U.S.C. § 1337(a).

9. Venue is proper in this Court as this is the court for the district and division embracing the place where the action is pending in state court. 28 U.S.C. § 1391.

WHEREFORE, Defendants pray that the above-referenced action now pending in the Eighth Judicial District Court of the State of Nevada in and for the County of Clark be removed therefrom to this Court.

Dated this 16th day of December, 2019.

JACKSON LEWIS P.C.

/s/ Deverie J. Christensen
Deverie J. Christensen, Bar #5837
Joshua A. Sliker, Bar #12493
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

*Attorneys for Defendants
Wynn Las Vegas, LLC and Wynn Resorts,
Ltd.*

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 16th
3 day of December, 2019, I caused to be served via the Court's CM/ECF Filing, a true and correct
4 copy of the above foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL**
5 **ACTION FROM STATE COURT** properly addressed to the following:

6 Richard Harris, Esq.
7 Benjamin Cloward, Esq.
8 Burke Huber, Esq.
Richard Harris Law Firm
9 801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

10 Tamara Beatty Peterson
Peterson Baker PLLC
11 702 S. 7th Street
Las Vegas, Nevada 89101
Attorney for Stephen Alan Wynn

13 Maximiliano Couvillier, III
Kennedy & Couvillier
14 3271 E. Warm Springs Road
Las Vegas, Nevada 89102
Attorney for Maurice Wooden

16 */s/ Kelley Chandler*
17 Employee of Jackson Lewis P.C.
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